U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
ESI - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #15**
Final POLREP for Fund-Lead Removal Activities
ESI
B5YS
Indianapolis, IN
Latitude: 39.9128600 Longitude: -86.2423680

To:
Charles Gebien, U.S. EPA Region V
Linda Nachowicz, U.S. EPA Region V, ERB 2
Richard Karl, U.S. EPA Region V
Susan Perdomo, U.S. EPA Region V, ORC
Mark Johnson, ATSDR
David Chung, U.S. EPA HQ
William Messenger, U.S. EPA Region V
USCG NRC, NRC
John Maritote, U.S. EPA Region V
Nola Hicks, U.S. EPA Region V, ORC
John Steketee, U.S. EPA Region V, ORC
Gary Prichard, U.S. EPA Region V, ORC
Debbie Keating, U.S. EPA Region V, ESS
Janet Pope, U.S. EPA Region V
Jeff Kelley, U.S. EPA Region V, CIC
Carol Staniec, U.S. EPA Region V, Water
Kendall Moore, U.S. EPA Region V, LCD
Karen Kirchner, U.S. EPA Region V, LCD
Harry Atkinson, IDEM
Ken McDaniel, IDEM
Ryan Groves, IDEM
George Richotte, IDEM
Natalie Maupin, IDEM
Jason Doerflein, Marion County Health Department
Richard Wise, City of Indianapolis
Tom White, City of Indianapolis
Sue Michael, City of Indianapolis
Kim Cussen, United Water
Stephen Jones, Pike Fire Department
Robert Darnell, U.S. Department of Justice
Randy Braun, IDEM
Jay Rauh, Weston Solutions

From: Anita L. Boseman and Verneta Simon, On-Scene Coordinators
Date: 4/15/2011
Reporting Period: 3/12/2011 - 4/15/2011

1. Introduction

1.1 Background

Site Number:	B5YS	**Contract Number:**	EP-S5-09-05
D.O. Number:	47	**Action Memo Date:**	9/30/2010
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/8/2010	**Start Date:**	10/8/2010
Demob Date:	4/15/2011	**Completion Date:**	4/15/2011
CERCLIS ID:	INN0051050501	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Bankrupt Commercial Used Oils Facility

1.1.2 Site Description

The ESI site was a commercial used oil processing facility that included a tank farm and several ancillary buildings such as a wastewater treatment plant, a sludge treatment building, a sludge treatment process area, an oil dehydration process area, laboratory/office building, and a truck off-loading building. In addition, the ESI facility has a parking lot in front of the tank farm, a maintenance building immediately adjacent to the tank farm, and a rail unloading area less than one mile west of the tank farm. The parking lot, maintenance building, and rail unloading area were leased from Marathon Petroleum.

The tank farm and ancillary buildings cover approximately 8.2 acres and have multiple process and storage tanks, ranging in size from 1,200 to 1,000,000 gallons in volume. The tank farm is designed so that all stormwater is captured in its internal sewer system and ultimately run through the wastewater processing equipment prior to being discharged into the City of Indianapolis Sanitary Sewer System.

1.1.2.1 Location

4910 West 86th Street, Indianapolis, Indiana 46268

1.1.2.2 Description of Threat

There are a number of chemicals stored at the facility, for example, recycled oils, caustic soda, hydrogen peroxide and sulfuric acid in tanks and totes. In addition, there are 1.5 million gallons of sludge stored on-site in two separate one million gallon bunker tanks. Furthermore, all the storm water drains into the bunker tanks with the 1.5 million gallons of sludge, therefore, there is a strong potential for an overflow during high intensity rainfall events.

From 2007 to the present, there have been City of Indianapolis sanitary sewer overflows that were traced to this facility. Contaminants were found as far as 6 miles from this facility at 27 residences and three golf courses: Riverside Golf Academy, Riverside Golf Course, and Coffin Golf course. The Indianapolis Department of Public Works has spent about $100,000 dealing with the sewer overflows. In one home, it was necessary to replace the hot water tank and the sump pump because of the overflow backing up into their basement.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On July 18, 2007, ESI was informed by a customer that they had discovered 28 mg/kg PCBs in a used oil shipment from ESI. This resulted in some PCB remediation, however, there is one tank, Tank #51, and maybe two additional tanks, Tank #43 and #44 that were PCB impacted. On September 30, 2010 Tank #51 received a TSCA approval letter on a remediation process to be followed by WSP, ESI's Insurance Company's Environmental Consultant.

A limited site assessment was conducted on September 1,2010. Also, on September 1, there was a joint IDEM and USEPA Land and Chemicals PCB inspection.

Prior to USEPA mobilizing to the site, the City of Indianapolis Department of Public Works and United Water checked on ESI and provided a chemical inventory. On October 7, IDEM responded to the security guard's observation of a ESI tanker leaking and placed boom until USEPA arrived on October 8.

2. Current Activities

2.1 Operations Section

2. Current Activities

2.1.1 Narrative

2.1.2 Response Actions to Date

From March 12 until April 15, 2011

- On March 15, 2011, ERRS intended to discharge water from the southwest area to the City sanitary sewer but delayed the discharge event until March 17, 2011, due to heavy precipitation
- On March 16, 2011, ERRS addressed the northwest corner of the ceiling in the Administration Building laboratory leaking rainwater by placing garbage bags and a garbage can to divert and collect the rainwater.
- On March 17, 2011, ERRS discharged 34,758 gallons of stormwater from the southwest area to the City of Indianapolis sanitary system, for a total of 310,763.8 gal of the allotted 1 million gal in the modified SDA issued on February 15, 2011 Discharge event information was reported to the City
- On March 17, 2011, ERRS and START noted water infiltration from an unknown source to manway SS-12 from a pipe on the west side after the discharge event was completed and the water level was drawn down in the manway.
- On March 19, 2011, ERRS hauled out 8 loads (52,640 gal) of oily water from the west million gallon bunker tank for disposal at United Water in Cincinnati, OH
- On March 19, 2011, ERRS discharged 25,743 gal of stormwater from the southwest area to the City of Indianapolis sanitary system, for a total of 336,506 8 gal of the allotted 1 million gal in the modified SDA issued on February 15, 2011 Discharge event information was reported to the City
- On March 22, 2011, ERRS hauled out 3 loads (18,500 gal) of oily water from the west million

gallon bunker tank for disposal at United Water in Cincinnati, OH

- On March 22, 2011, ERRS discharged 52,164 gal of stormwater from the southwest area to the City of Indianapolis sanitary system, for a total of 388,670 8 gal of the allotted 1 million gal in the modified SDA issued on February 15, 2011 The discharge event information was reported to the City of Indianapolis
- On March 22, 2011, Dave McLay of WSP Environment & Energy was on site with consultants regarding remediation of Tank 51.
- On March 23, 2011, ERRS discharged 21,383 gal of stormwater from the southwest area to the City of Indianapolis sanitary system, for a total of 410,053.8 gal of the allotted 1 million gal in the modified SDA issued on February 15, 2011 The discharge event information was reported to the City by OSC Boseman
- On March 23, 2011, ERRS hauled out 12 loads (73,140 gal) of oily water from the west million gallon bunker tank for disposal at United Water in Cincinnati, OH.
- On March 31, 2011, ERRS discharged 50,623 gal of stormwater from the southwest area to the City of Indianapolis sanitary system, for a total of 460,676 8 gal of the allotted 1 million gal in the modified SDA issued on February 15, 2011 The discharge event information was reported to the City by OSC Boseman
- On March 31, 2011, ERRS hauled out 12 loads (72,000 gal) of oily water from the west million gallon bunker tank for disposal at United Water in Cincinnati, OH
- On April 6, 2011, ERRS discharged 53,029 gal of stormwater from the southwest area to the City of Indianapolis sanitary system, for a total of 513,705.8 gal of the allotted 1 million gal in the modified SDA issued on February 15, 2011. The discharge event information was reported to the City.
- On April 6, 2011, U.S. EPA met with personnel from Safety-Kleen (Project Coordinator) and TriHydro (Contractor), both from the PRP Group. The PRP Group personnel began waste characterization sampling and waste volume assessment activities.
- On April 7, 2011, ERRS discharged 37,281 gal of stormwater from the southwest area to the City of Indianapolis sanitary system, for a total of 550,986.8 gal of the allotted 1 million gal in the modified SDA issued on February 15, 2011. Discharge event information was reported to the City.
- Pursuant to the modified SDA, OSC Boseman continued to notify the City of Indianapolis prior to discharging of intent to discharge and report discharge events.
- On April 7, 2011, OSC Boseman, PRP Group personnel, and the City of Indianapolis personnel met at the site for a transitional site meeting.
- On April 8, 2011, OSC Boseman and TriHydro were on site. TriHydro continued site characterization in preparation for removal activities. U.S. EPA will oversee the PRP Group's removal activities.
- On April 8, 2011, U.S. EPA agreed to continue the discharge events as outlined in the modified SDA until the City of Indianapolis has issued a Discharge Permit to the PRP Group. TriHydro loaded and hauled off 5,000 gallons of oily water from the northeast area storm sewer. The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio. The PRP Group has contracted site security, and utilities will be transferred to PRP Group on April 11, 2011.
- On April, 11, 2011, START member Jay Rauh mobilized to the Site to begin oversight of the PRP removal activities. Tim Gunn of TriHydro is the on-site PRP Group representative. Mr.Gunn requested that US EPA discharge water from the southwest area storm sewer, since the PRP group had not received their SDA from the City of Indianapolis.

TriHydro loaded and hauled off 24,000 gallons of oily water from the northeast area storm sewer. The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio. The water level in the northeast area storm sewer dropped by 1.5 feet after removing 24,000 gallons of oily water from it.

US EPA OSC Verneta Simon, US EPA Community Involvement Coordinator (CIC) Janet Pope, Steve Fleming, PRP's Project Coordinator, TriHydro Project Manager Gary Risse, Stephen Jones, Pike Township Fire Department (PTFD), and the City of Indianapolis participated in a community meeting at 1200 Madison, Indianapolis, Indiana.

- On April 12, 2011, Rauh, Gunn, and Risse were present at the Site.

Stephen Jones, PTFD Fire Marshal, was on site to relay his concerns about fire hazards and building occupancy. Since the fire suppression systems were inoperable in the unloading building and solid storage building, he requested that all materials be removed those buildings. He also requested that all vehicles park further than 20 feet from either building to prevent any potential fire from spreading from one source to the other. Since the unloading building has usable offices attached, he would allow those offices to be occupied if those conditions were met. He will return to the Site to decide if the materials have been removed to his satisfaction before major work begins.

Sam Coffman and Michael Gordon of Commercial Sewer Cleaning (CSC) were on site to attempt videotaping portions of the northeast storm sewer system. They were not able to use their camera due to water and sludge buildup in the sewer.

Riche Byrd of Environmental Restoration, a US EPA ERRS contractor, was on site to discharge storm water from the southwest area to the City of Indianapolis sanitary sewer system under the US EPA SDA. 33,132 gallons of water was discharged. A total of 584,118.8 gallons of the allotted 1 million gallons in the modified SDA issued on February 15, 2011 has been discharged to the City of Indianapolis sanitary sewer system.

Gunn collected water sample SWArea-SS17,041211 from the effluent of the southwest area discharge system. The sampling results will be submitted to the City of Indianapolis for consideration of a discharge permit for the PRP Group. Gunn also collected water sample NEArea-SSVault,041211 from the northeast area storm sewer system. The sampling results will be used to explore alternate disposal options for the oily water.

TriHydro loaded and hauled off 19,400 gallons of oily water from the northeast area storm sewer The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio

- On April, 13, 2011, TriHydro subcontractor, EQIS, began removing materials from the unloading building. All oily waste was placed in a roll-off box to be disposed of as Subtitle D oily waste, and the other material was placed in a standard roll-off box to be landfilled.

- On April, 14, 2011, TriHydro subcontractor, EQIS, continued removing materials from the unloading building. All oily waste was placed in a roll-off box to be disposed of as Subtitle D oily waste, and the other material was placed in a standard roll-off box to be landfilled. EQIS also collected unusable oily hoses and placed them in the Subtitle D roll-off box.

Tom White and Mark Richards of the City of Indianapolis Water Department were on site to collect a water sample from the Tank 51 containment area. Sample ESI-51-041411 was collected from the northeast corner of the Tank 51 containment. The sampling results will be used for consideration of a discharge permit to the City of Indianapolis storm sewer system.

TriHydro loaded and hauled off 5,000 gallons of oily water from the oil/water separator west of the

unloading building After pumping 5,000 gallons of water from the oil/water separator, the water level in the oil/water separator dropped by 0 73 feet The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio

- On April 15, 2011, TriHydro subcontractor, EQIS, continued removing materials from the unloading building. All oily waste was placed in a roll-off box to be disposed of as Subtitle D oily waste, and the other material was placed in a standard roll-off box to be landfilled. TryHydro subcontracted an electrician to identify any potential electrical hazards at the Site TriHydro loaded and hauled off 15,000 gallons of oily water from the northeast area storm sewer The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio
- The weather forecast for Indianapolis, IN starting April 16, 2011 calls for several days of rain.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

On April 7, 2011, the Administrative Settlement Agreement on Consent (ASAOC) has fully executed. A copy of the ASAOC is available on this website under "Documents". On April 12, 2011, the City of Indianapolis issued a SDA to the PRP group.

2.1.4 Progress Metrics

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Waste Stream	*Quantity*	*Treatment*	*Disposal*
Hydrogen Peroxide	900 gal	--	EQ Detroit, Inc.

Sodium Hydrosulfide	300 gal	Re-use	EQ Detroit, Inc.
Sodium Hydroxide	5,150 gal	United Wastewater for Re-use	--
Oily Water	1,054,278 gal	United Wastewater for Re-use	--
Subsurface Soil	6.90 tons	--	Southside Landfill
Stormwater	584,118.8 gal	City of Indianapolis Sanitary Sewer	--
Labpack Materials	NA	--	PSC Environmental Services
PPE	0.61 tons	--	Southside Landfill

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

None.

2.2.1.2 Next Steps

U S.EPA, START, and ERRS will be on site in April to transition the Site to the PRP Group

2.2.1.3 Issues

A Backflow Preventer Inspection took place on April 6, 2011. Four of the nine backflow preventers were unable to be tested. Details will be outlined in the Backflow Preventer Inspection Report. An extension will be requested to address these four backflow preventers and the associated waterline.

2.3 Logistics Section

Not applicable.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$625,000.00	$578,680.00	$46,320.00	7.41%
TAT/START	$57,200.00	$48,443.33	$8,756.67	15.31%
Intramural Costs				
Total Site Costs	$682,200.00	$627,123.33	$55,076.67	8.07%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

Not applicable.

2.6 Liaison Officer

Not applicable.

2.7 Information Officer

2.7.1 Public Information Officer

Not applicable.

2 Community Involvement Coordinator

The next community meeting will be held on June 6, 2011 at 2 pm.

3. Participating Entities

3.1 Unified Command

Indiana Department of Environmental Management
Indianapolis Department of Public Works
Pike Township Fire Department
City of Indianapolis

3.2 Cooperating and Assisting Agencies

Marion County Health Department

4. Personnel On Site

N/A

5. Definition of Terms

ERRS – Emergency and Rapid Response Services
IDEM – Indiana Department of Environmental Management
OSC – On-Scene Coordinator
RCRA – Resource Conservation and Recovery Act
START – Superfund Technical Assessment and Response Team
U S. EPA – United States Environmental Protection Agency
POLREP – Pollution Report
ASAOC - Administrative Settlement Agreement on Consent
PRP - Potentially Responsible Party

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information, please refer to the documents section at www epaosc org/esi

6.2 Reporting Schedule

7. Situational Reference Materials

For additional information, please refer to the documents section at www epaosc org/esi